

December 10, 2019

**Sent via Electronic Mail and Overnight Courier**

Director, Emergency and Remedial Response Division  
Attn: Chief, New Jersey Remediation Branch, Pohatcong Site  
United States Environmental Protection Agency Region 2  
290 Broadway, 19th Floor  
New York, New York 10007

New Jersey Superfund Branch  
Office of Regional Counsel  
United States Environmental Protection Agency Region 2  
290 Broadway, 17th Floor  
New York, New York 10007  
Attention: Attorney for Pohatcong Site

New Jersey Department of Environmental Protection  
ATTN.: Fred Mumford  
380 Scotch Road  
West Trenton, New Jersey 08628  
(*via electronic mail only*)

**Re: Monthly Progress Report No. 38  
Reporting Period November 1, 2019 through November 30, 2019  
Operable Unit 3  
Pohatcong Valley Groundwater Contamination Superfund Site  
Warren County, New Jersey**

Dear Pohatcong Consent Decree Notice Recipients:

On behalf of Pechiney Plastics Packaging, Inc. (PPPI), the Primary Settling Defendant for the Remedial Design/Remedial Action Consent Decree (CD)<sup>1</sup>, this monthly progress report is submitted in compliance with section X, paragraph 30 of the CD and section IV.A of the Statement of Work for Remedial Design and Remedial Action for Operable Unit 3 (OU3 SOW)<sup>2</sup> of the Pohatcong Valley Groundwater Contamination Superfund (PVGCS) Site. As required by

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<sup>1</sup> In the matter of United States of America v. PPPI (Civil Action No. 09-cv-05692) and United States of America v. Bristol Myers Squibb Company, et. al. (Civil Action No. 13-cv-05798) effective March 11, 2015.

<sup>2</sup> Pursuant to Section VI. Paragraph 12.c(1) of the CD, USEPA approval of the OU3 SOW was received on June 26, 2017.

the OU3 SOW, this report provides a description of the actions and activities undertaken pursuant to the CD during this reporting period and plans, actions and data scheduled in the next eight weeks.

### **Actions Taken toward Compliance with Consent Decree, including Community Relations**

The following activities were performed during this reporting period:

- Comments on the *Remedial Action Work Plan Addendum No. 1* were received from the USEPA in correspondence dated November 4, 2019.
- The Monthly Progress Report for OU3 for the October 2019 reporting period was submitted to the USEPA in correspondence dated November 8, 2019.
- Responses to additional comments on the *Remedial Action Work Plan Addendum No. 1* were submitted to USEPA on November 13, 2019.
- *Remedial Action Work Plan Addendum No. 2* for the OU3 Remedial Action was submitted to USEPA on November 14, 2019.
- A construction kick-off meeting with USEPA and representatives of the U.S. Army Corps of Engineers took place on November 15, 2019 and a summary of the meeting was submitted to USEPA on November 27, 2019.
- Notification to proceed with drilling activities beginning the week of November 18, 2019 was received by USEPA in correspondence dated November 17, 2019.
- Drilling for the installation of heater fans was initiated on November 22, 2019.
- A work schedule for the next four to six weeks was sent to USEPA on November 27, 2019.

### **Problems Encountered, Actions Taken and Their Resolutions**

The following problems were encountered during this reporting period:

- None.

### **Analytical Results and Data Received During the Reporting Period**

The following analytical data were received during this reporting period:

- None.

### **Modifications to the OU3 Work Plans or Schedules**

The following modifications to Work Plans for OU3 or other schedules proposed to USEPA were submitted during this reporting period:

- Field Modification #1 – Heater Well Thermocouple Material of Construction (MOC) was submitted to USEPA on November 25, 2019 and was subsequently approved on November 26, 2019.

## Anticipated Plans, Actions and Data Scheduled, including Community Relations (during the Next 8 weeks)

The following activities are planned for the next eight weeks:

- Continued drilling related to implementation of the OU3 Remedial Action is planned.

## Estimate of the Percentage of the Work Completed

The following provides a qualified estimate of the percentage of the work required by the CD that has been completed through this reporting period:

Work to be Performed	Estimated Percent Work Completed
Remedial Design	100%
Remedial Construction and Implementation	1%
Long-term operation and maintenance of the existing shallow SVE and sub-slab depressurization (SSD) systems	Ongoing
Long-term groundwater and indoor air monitoring	To be Determined <sup>1</sup>
Institutional Controls	> 95%

<sup>1</sup> Per Sections XI.A and XI.D of the OU3 SOW (Appendix B-3 to the CD), a plan for long-term groundwater monitoring and indoor-air sampling/remediation will be proposed in the RAWP and documented in the O&M Plan.

## Delays Encountered or Anticipated, and Efforts Taken to Mitigate

The following delays were encountered during this reporting period:

- None.

## Closing

Pursuant to section X, paragraph.30 of the CD, three written copies of this monthly progress report have been submitted to the designated recipients. If you have any questions or comments regarding this monthly progress report, please feel free to contact me.

Sincerely,

*Luis Hidalgo*

Luis Hidalgo  
Project Coordinator

cc: Via Aconex and Electronic Mail  
Michelle Granger – USEPA, Region 2  
Jeff Armington – Rio Tinto  
Bruce White – Barnes & Thornburg LLP  
Daniel Fortaney, Albéa Americas  
Felix Miranda, Albéa Americas  
Russell Gladd, Albéa Americas  
Bruce Kennington – Ramboll